

ORIGINAL

FILED
U.S. DISTRICT COURT
NORTHERN DIST. OF TX.
FT. WORTH DIVISION

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

CLERK OF COURT

DEC 14 PM 2:47

UNITED STATES OF AMERICA

v.

CRAIG JEROME GADLEY, JR.
a/k/a "C.J.", "Cjay" and "Cjay the Don"
JOSHUA ALEXANDER SMITH
a/k/a "Moneybags"

(1)

(2)

§
§
§
§
§
§
§
§

No.

4-11 CR-203-Y

INDICTMENT

The Grand Jury Charges:

Count One

Sex Trafficking of a Minor
(Violation of 18 U.S.C. § 1591)

Beginning in or around May 2011 and continuing thereafter until on or about June 24, 2011, in the Fort Worth Division of the Northern District of Texas, defendant **Craig Jerome Gadley, Jr.**, also known as "C.J.," "Cjay," and "Cjay the Don," using force, fraud and coercion, knowingly recruited, enticed, harbored, transported, provided, obtained and maintained by any means, in and affecting interstate commerce, K.P., a minor under the age of 18, knowing and in reckless disregard of the fact that K.P. had not attained the age of 18 years and that K.P. would be caused to engage in a commercial sex act, and knowing and in reckless disregard of the fact that force, fraud, and coercion would be used against K.P. to cause her to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a)(1) and (b)(1).

Count Two

Sex Trafficking by Force, Fraud, and Coercion
(Violation of 18 U.S.C. § 1591)

Beginning in or around May 2011 and continuing thereafter until in or around July 2011, in the Fort Worth Division of the Northern District of Texas, defendant **Joshua Alexander Smith**, also known as “Moneybags,” using force, fraud, and coercion, knowingly recruited, enticed, harbored, transported, provided, obtained and maintained by any means, in and affecting interstate commerce, C.W., knowing and in reckless disregard of the fact that force, fraud, and coercion would be used against C.W. to cause her to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a)(1) and (b)(1).

Count Three

Transportation of Minors for Prostitution
(Violation of 18 U.S.C. § 2423)

On or about July 26, 2011, in the Fort Worth Division of the Northern District of Texas and elsewhere, defendant **Craig Jerome Gadley, Jr.**, also known as “C.J.,” “Cjay,” or “Cjay the Don,” aided and abetted by others known to the Grand Jury, knowingly caused an individual, who had not attained the age of 18 years, to be transported in interstate commerce, that is, from the State of Louisiana to the State of Texas, with the intent that such individual engage in prostitution, a criminal offense under Texas Penal Code § 43.02.

In violation of 18 U.S.C. §§ 2423(a) and 2.

Forfeiture Notice
(18 U.S.C. § 1594(d) and 18 U.S.C. § 2428(a))

Upon conviction for any of the offenses alleged in Counts One and Three, pursuant to 18 U.S.C. §§ 1594(d) and 2428(a), defendant **Gadley** shall forfeit to the United States of America the defendant's interest in any property, real or personal, used or intended to be used to commit or to facilitate the commission of the offense and any property, real or personal, constituting or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of the offense.

Upon conviction for the offense alleged in Count Two and pursuant to 18 U.S.C. § 1594(d), defendant **Smith** shall forfeit to the United States of America the defendant's interest in all property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offense and any property, real or personal, constituting or derived from any proceeds the defendant obtained, directly or indirectly, as a result of the offense.

This property includes, but is not limited to, the following:

- a. Money Judgment as to defendant **Gadley**: The total amount of property derived from the proceeds obtained, directly or indirectly as a result of the offenses listed in Counts One and Three; and
- b. Money Judgment as to defendant **Smith**: The total amount of property derived from the proceeds obtained, directly or indirectly as a result of the offense listed in Count Two.

Substitute Assets

Pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c), if any of the property described above pertaining to Counts One through Three, as a result of any act or omission of any defendant:

- a. cannot be located upon exercise of due diligence;
- b. has been transferred or deposited with a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been commingled with other property which cannot be divided without difficulty,

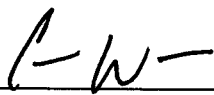
the United States of America shall be entitled to forfeiture of substitute property from that defendant up to the value of the previously described property that is subject to forfeiture.

A TRUE BILL.



FOREPERSON

SARAH R. SALDAÑA
UNITED STATES ATTORNEY


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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

THE UNITED STATES OF AMERICA

VS.

CRAIG JEROME GADLEY, JR. (1)
a/k/a "C.J.", "Cjay" and "Cjay the Don"

JOSHUA ALEXANDER SMITH (2)
a/k/a "Moneybags"

INDICTMENT

18 U.S.C. § 1591

Sex Trafficking of a Minor

(1 COUNT)

18 U.S.C. § 1591

Sex Trafficking by Force, Fraud, and Coercion

(1 COUNT)

18 U.S.C. § 2423

Transportation of Minors for Prostitution

(1 COUNT)

18 U.S.C. § 1594(d) and 18 U.S.C. § 2428(a)

Forfeiture

A true bill rendered:

FORT WORTH

FOREPERSON

Filed in open court this 14th day of December, A.D. 2011.

In Custody

UNITED STATES MAGISTRATE JUDGE

(Magistrate Court Number, 4:11-MJ-342:Gadley, 4:11-MJ-347: Smith)

ORIGINAL

4-11 CR-203-Y

*Criminal Case Cover Sheet*UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXASRelated Case InformationSuperseding Indictment: ☐ Yes ☒ NoNew Defendant: ☒ Yes ☐ NoPending CR Case in NDTX: ☐ Yes ☒ No

Search Warrant Case Number: _____

Rule 20 from District of: _____

Magistrate Case Number 4:11-MJ-342

1. **Defendant Information**Juvenile: ☐ Yes ☒ NoSealed: ☐ Yes ☒ No

Defendant Name

CRAIG JEROME GADLEY, JR. (1)

Alias Name: "C.J.", "Cjay" and "Cjay the Don"

Address

2. **U.S. Attorney Information**AUSA Christopher WolfeBar # 240082943. **Interpreter**☐ Yes ☒ No

If Yes, list language and/or dialect: _____

4. **Location Status**

Arrest Date: September 28, 2011

☒ Federal Inmate☐ Already in State Custody☐ On Pretrial Release☐ Warrant to Issue5. **U.S.C. Citations**Total # of Counts as to This Defendant: 2 + Forfeiture ☐ Petty ☐ Misdemeanor ☒ Felony

<u>Citation</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>
18 U.S.C. § 1591	Sex Trafficking of a Minor	1
18 U.S.C. § 2423	Transportation of Minors for Prostitution	3
18 U.S.C. § 1594(d) and 18 U.S.C. § 2428 (a)	Forfeiture	

Date 12/14/2011Signature of AUSA: 

ORIGINAL

4-11 CR-203-1

Criminal Case Cover SheetUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXASRelated Case InformationSuperseding Indictment: ☐ Yes ☒ NoNew Defendant: ☒ Yes ☐ NoPending CR Case in NDTX: ☐ Yes ☒ No

Search Warrant Case Number: _____

Rule 20 from District of: _____

Magistrate Case Number 4:11-MJ-347

1. **Defendant Information**Juvenile: ☐ Yes ☒ NoSealed: ☐ Yes ☒ No

Defendant Name

JOSHUA ALEXANDER SMITH (2)

Alias Name: "Moneybags"

Address

2. **U.S. Attorney Information**AUSA Christopher WolfeBar # 240082943. **Interpreter**☐ Yes ☒ No

If Yes, list language and/or dialect: _____

4. **Location Status**

Arrest Date: November 15, 2011

☒ Federal Inmate☐ Already in State Custody☐ On Pretrial Release☐ Warrant to Issue5. **U.S.C. Citations**Total # of Counts as to This Defendant: 1 + Forfeiture ☐ Petty ☐ Misdemeanor ☒ FelonyCitationDescription of Offense ChargedCount(s)

18 U.S.C. § 1591

Sex Trafficking by Force, Fraud,
and Coercion

2

18 U.S.C. § 1594(d) and
18 U.S.C. § 2428 (a)

Forfeiture

Date 12/14/2011Signature of AUSA: 